



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MSA/SDD
F.#2011R00783

271 Cadman Plaza East

Brooklyn, New York 11201

August 30, 2012

By ECF and Hand

Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Agron Hasbajrami,
Criminal Docket No. 11-623 (S-1) (JG)

Dear Judge Gleeson:

On April 12, 2012, the defendant in the above-referenced case pleaded guilty to Count Two of the superseding indictment, which charged him with attempting to provide material support to terrorists in violation of 18 U.S.C. § 2339(A). At the conclusion of the plea proceeding, the Court scheduled sentencing for September 14, 2012, and directed the parties to file submissions by September 7, 2012 addressing the issue of whether the Court should accept the defendant's plea, pursuant to Section 6B1.2 of the United States Sentencing Guidelines. The Court indicated that it would reserve decision on the plea until reviewing the Presentence Investigation Report ("PSR") and the parties' submissions.

The government writes to respectfully request a brief adjournment of sentencing until approximately October 16, 2012, with a due date of approximately one week prior to sentencing for the parties' submissions. This request is made on behalf of both the government and defense counsel because the parties are engaged in sensitive, ongoing discussions aimed at reaching a stipulation to facts that are relevant to sentencing, which likely will require a short addendum to the PSR. The parties are scheduled to next meet on September 5, 2012 at noon. In addition, counsel for both the government and the defense currently are scheduled to be overseas for portions of September and early October.

The parties expect that continued discussions are likely to resolve factual issues relevant to sentencing and thus obviate the need for a hearing. Accordingly, the parties jointly request a brief adjournment to continue these discussions, and to apprise the Probation Department of facts relevant to the PSR.

Respectfully submitted,

LORETTA E. LYNCH
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